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May 6, 2020

VIA ECF

The Honorable Analisa Torres, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Calcano et al. v. Dig Inn Restaurant Group, LLC*
Case No.: 1:19-cv-11374-AT

Dear Judge Torres:

We represent defendant Dig Inn Restaurant Group, LLC (“Defendant”) in this case. We have conferred with counsel for named plaintiff, Evelina Calcano (“Plaintiff”), and write with their consent to respectfully request an extension of Defendant’s time to respond to the complaint, pursuant to Rule I(C) of Your Honor’s Individual Practices in Civil Cases.

Defendant respectfully requests an extension of thirty (30) days to June 8, 2020 to submit its response to the complaint. As we have shared with Plaintiff’s counsel, who have expressed understanding, Defendant, being in the restaurant industry in New York City, is having its people, resources, and attention pulled in multiple directions under the current trying circumstances. Defendant, therefore, requires additional time to prepare its response to the complaint and thereafter to discuss case management issues with Plaintiff.

As this requested extension of time would affect other scheduled dates, specifically the parties’ submission of a joint letter and proposed case management plan, currently scheduled for May 13, 2020, and the initial pretrial conference, currently scheduled for May 20, 2020, Defendant also respectfully and with Plaintiff’s consent requests that those dates be adjourned to dates after Defendant’s submission of its response to the complaint, subject to the Court’s calendar.

Hon. Analisa Torres, U.S.D.J.
U.S. District Court, S.D.N.Y.
May 6, 2020
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This represents Defendant's second request for such an extension of time and related adjournments. The prior request, also upon consent, was granted (ECF Document 17). We appreciate the Court's attention to this matter and are available at the Court's convenience should it have any questions.

Respectfully submitted,

David Grech


David J. Grech
Brittany L. Primavera

cc: Chambers (*via* email)
All Counsel of Record (*via* ECF)

GRANTED. By **June 8, 2020**, Defendant shall answer or otherwise respond to the complaint. It is further ORDERED that the initial pretrial conference scheduled for May 20, 2020 is ADJOURNED to **June 22, 2020**, at **10:20 a.m.** By **June 15, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: May 6, 2020
New York, New York



ANALISA TORRES
United States District Judge